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8 **UNITED STATES BANKRUPTCY COURT**
NORTHERN DISTRICT OF CALIFORNIA
9 **OAKLAND DIVISION**

10
11 In re)
Case No. 14-40781 WJL
12)
Chapter 7
13 MOATAZ M. MAASRANI and)
CLAUDINE S. MAASRANI,)
14)
15 Debtors.)
16)

17 **UNITED STATES U.S. TRUSTEE'S *EX PARTE* MOTION FOR ORDER**
18 **REQUIRING MOATAZ M. MAASRANI TO PRODUCE DOCUMENTS AND**
TO APPEAR FOR ORAL EXAMINATION UNDER FED. R. BANK. PRO. 2004

19 Tracy Hope Davis, the United States Trustee for Region 17 (the "United States Trustee"),
20 by and through her undersigned counsel, moves *ex parte* for an order directing Debtor Moataz
21 M. Maasrani ("Mr. Maasrani") to produce certain documents and to submit for an examination
22 that will be taken under oath and recorded under Rule 2004 of the Federal Rules of Bankruptcy
23 Procedure. In support of her motion, the United States Trustee states:

24 1. On March 11, 2015, the Debtors Moataz M. Maasrani and Claudine S. Maasrani
25 filed a voluntary petition under Chapter 7 of the Bankruptcy Code. Docket No. 1.

1 2. The Debtors' first meeting of creditors was held on April 17, 2015. (*See* docket
2 notes entered 4/30/15). There have been four additional meetings of creditors held on May 15,
3 2015, June 12, 2015, July 17, 2015, and August 7, 2015. (*See* docket notes entered on 5/15/15,
4 6/12/15, 7/17/15 & 8/7/15).

5 3. At their meetings of creditors, the Debtors testified under oath regarding their
6 assets and liabilities. *Id.* Based upon that testimony and based upon the declaration filed by the
7 Chapter 7 trustee in support of her objection to the Debtors' motion to dismiss their case, the
8 United States Trustee believes that the Debtors have undervalued their principal residence on
9 Schedule A, have failed to disclose assets on their Schedule B and made numerous
10 misstatements and omissions on their Schedules and Statement of Financial Affairs. Docket No.
11 36.

12 4. As the result of the events set forth above, the United States Trustee requests that
13 Moataz M. Maasrani (Mr. Maasrani") be ordered to produce copies or originals of the documents
14 described in the attached Exhibit A to the attention of the undersigned at the Office of the United
15 States Trustee, ***1301 Clay Street, Oakland, California 94612 as to be received by 1:00 p.m. on***
16 ***or before September 23, 2015.***

17 5. In addition, the United States Trustee intends to examine Mr. Maasrani relating to
18 the circumstances surrounding the above bankruptcy filing, and in particular the undervaluation
19 and nondisclosure of assets, as well as misstatements and omissions on the Schedules and
20 Statement of Financial Affairs.

21 6. The United States Trustee requests that Mr. Maasrani be ordered to appear for an
22 examination that will be taken under oath and recorded under Rule 2004 if the Federal Rules of
23 Civil Procedure ***on October 1, 2015 at 10:30 a.m.*** at the Office of the United States Trustee,
24 ***1301 Clay Street, Suite 690N, Oakland, California 94612.***

1 WHEREFORE, the United States Trustee requests entry of an order requiring
2 Mr. Maasrani to produce the previously described documents on or before September 23, 2015
3 and to appear for and to submit examination that will be taken under oath and recorded under
4 Rule 2004 of the Federal Rules of Bankruptcy Procedure on October 1, 2015 at 10:30 a.m., and
5 for such other and further relief as the Court deems just and appropriate.

6 Dated: August 26, 2015

7 TRACY HOPE DAVIS
8 U.S. Trustee for Region 17

9 /s/Barbara A. Matthews /
10 BARBARA A. MATTHEWS
11 Trial Attorney, Oakland Division